



U.S. Department of Justice

*United States Attorney
District of New Jersey*

*CAMDEN FEDERAL BUILDING
& U.S. COURTHOUSE
401 Market Street, 4th Floor
Post Office Box 2098
Camden, New Jersey 08101-2098*

*856.757.5026
Fax: 856.968.4917*

May 3, 2018

DOCUMENT ELECTRONICALLY FILED

Honorable Robert B. Kugler
United States District Judge
Mitchell H. Cohen Courthouse
400 Cooper Street
Camden, New Jersey 08101

Re: Criminal No. 17-165 (RBK)
United States v. Darnel Johns

Dear Judge Kugler:

The United States is in receipt of Trace Media's Request for Disclosure of Sentencing Materials [Form DNJ-Cr-023] in the above captioned case. The United States opposes Trace Media's disclosure request because the parties submitted the sentencing materials in this case prior to September 1, 2017, the effective date of the District Court's new Protocol for Disclosure of Sentencing Materials (Sentencing Protocol). By its express terms, the Sentencing Protocol applies only to sentencing materials filed after September 1, 2017. Under the protocol in place at the time of sentencing in this case, sentencing materials were submitted directly to the court and were not publicly filed. Accordingly, the Government respectfully requests that the Court deny the disclosure request as the materials in question fall outside the timeframe and scope of the Court's new Sentencing Protocol.

Thank you for your attention to this matter.

Respectfully submitted,

CRAIG CARPENITO
United States Attorney

s/ SARA A. ALIABADI
By: SARA A. ALIABADI
Assistant United States Attorney

c: Thomas J. Young, Esq.
Brian Freskos